

Todd J. Johnston; SBN: 24050837
MCWHORTER, COBB & JOHNSON, LLP
1722 Broadway (79401)
P. O. Box 2547
Lubbock, Texas 79408
806/762-0214; 806/762-8014 (fax)
Proposed Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

In Re:	§	
	§	
Reddline Energy, Inc.,	§	Case No. 20-50239-rlj11
	§	
<i>Debtor.</i>	§	Chapter 11 Case

IMPORTANT NOTICE

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT 1205 TEXAS AVENUE, ROOM 306, LUBBOCK, TEXAS 79401 BEFORE THE CLOSE OF BUSINESS ON JANUARY 11, 2021, WHICH IS TWENTY-FOUR (24) DAYS FROM THE DATE OF SERVICE HEREOF. ANY RESPONSE MUST BE IN WRITING AND FILED WITH THE CLERK, AND A COPY MUST BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN.

IN THE EVENT ANY OBJECTION TO THIS MOTION IS FILED, A HEARING WILL BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO OBJECTION TO SUCH MOTION IS TIMELY FILED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRATING THE RELIEF SOUGHT.

**MOTION FOR ORDER APPROVING EMPLOYMENT
OF COUNSEL FOR DEBTOR**

TO THE HONORABLE ROBERT L. JONES, United States Bankruptcy Judge:

COMES NOW, Reddline Energy, Inc., the debtor in the above-entitled and numbered bankruptcy proceeding (“**Reddline**” or “**Movant**”), and files this Motion for Order Approving Employment of Counsel for Debtor, and in support of such Motion would respectfully show the Court as follows:

1. The Movant herein is the debtor in the above referenced bankruptcy proceeding.

2. Reddline filed for relief under Chapter 11 of the United States Bankruptcy Code on December 18, 2020.

3. Movant asserts that it is necessary to retain and employ attorneys for the administration of this bankruptcy estate for the following purposes:

- a. Preparation of motions, notices, orders and legal papers necessary to comply with the requisites of the United States Bankruptcy Code and Bankruptcy Rules;
- b. Counseling with debtor regarding preparation of operating reports, motions for use of cash collateral, and development of a Chapter 11 Plan;
- c. Advise the debtor concerning questions arising in the conduct of the administration of the estate and concerning the debtor's rights and remedies with regard to the estate's assets and the claims of secured, preferred and unsecured creditors and other parties in interest; and
- d. Assist the debtor with any and all sales of assets, closings of such sales, and distributions to creditors.

4. Reddline desires that it be authorized to employ McWhorter, Cobb & Johnson, LLP, 1722 Broadway, Lubbock, Texas, as counsel in this bankruptcy proceeding for such compensation and reimbursement of expenses as is just. Todd J. Johnston, of McWhorter, Cobb & Johnson, LLP, practices almost exclusively in the bankruptcy area and is admitted to practice with knowledge and experience in bankruptcy practice. He is duly qualified to render the necessary legal services and has no connection with Reddline, its creditors, or any other parties in interest, as reflected by the Affidavit which is attached hereto and incorporated herein for all purposes as Exhibit "A."

WHEREFORE, PREMISES CONSIDERED, Reddline Energy, Inc., debtor herein, prays that the Court approve the employment of McWhorter, Cobb & Johnson, LLP, 1722 Broadway, Lubbock, Texas, as its bankruptcy counsel in this proceeding, and also seeks such other and further relief as the Court may deem necessary and proper.

Dated: December 18, 2020

Respectfully submitted,

MCWHORTER COBB & JOHNSON, LLP
1722 Broadway
Lubbock, Texas 79401
806/762-0214; 806/762-8014 (FAX)
Email: tjohnston@mcjllp.com

By: /s/ Todd J. Johnston

Todd J. Johnston
Proposed Attorneys for Debtor

Reddline Energy, Inc.

By: 
Alan Davis

CERTIFICATE OF SERVICE

I, Todd J. Johnston, do hereby certify that a true and correct copy of the foregoing *Motion* was served by either court enabled electronic service or regular first class U. S. Mail upon the following listed parties on this 18th day of December, 2020:

1. U. S. Trustee's Office
1100 Commerce Street, Room 976
Dallas, Texas 75242
2. Reddline Energy, Inc.
3323 N. Midland Dr. Ste 113, #215
Midland, TX 797070
3. All parties in interest registered with the
U. S. Bankruptcy Court to receive electronic
notices in this case.
4. All creditors and parties in interest
identified on the attached mailing matrix

/s/ Todd J. Johnston
Todd J. Johnston

STATE OF TEXAS

§
§
§

EXHIBIT "A"

COUNTY OF LUBBOCK

AFFIDAVIT OF TODD J. JOHNSTON

Before me, the undersigned authority, on this day personally appeared Todd J. Johnston of McWhorter, Cobb & Johnson, LLP of Lubbock, Texas, being by me duly sworn, upon oath deposed and said:

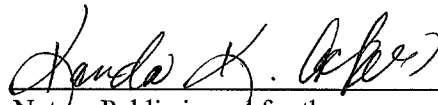
1. That he is a resident of Lubbock, Lubbock County, Texas, that he is over the age of 21 years and is of sound mind and has never been convicted of an offense; that he is an attorney practicing in Lubbock, Lubbock County, Texas, and possesses all of the qualifications of an attorney in the State.
2. That he has read the Motion for Order Approving Employment of Counsel in connection with the Chapter 11 bankruptcy proceeding of Reddline Energy, Inc..
3. That Todd J. Johnston of McWhorter, Cobb & Johnson, LLP has no connection with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.

FURTHER AFFIANT SAITH NOT.



Proposed Attorney for Debtor
McWhorter, Cobb & Johnson, LLP

SUBSCRIBED AND SWORN to before me this 18th day of December, 2020.



Notary Public in and for the
State of Texas

